



Hoffman Employment Law, LLC

600 Jefferson Plaza Suite 204

Rockville, MD 20852

Phone: 301-251-3752 | Fax: 301-251-3753

Account Statement

Prepared for Elisa Betz

Re: Dellis' Bar & Grill

Previous Balance	\$0.00
Current Charges	\$14,752.00
New Balance	\$14,752.00
Adjustments	\$0.00
Payments	\$0.00
Now Due	\$14,752.00
Trust Account	\$0.00

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PRE-BILL

Elisa Betz

Invoice Date: February 11, 2020

Invoice Number: Pre-bill

Invoice Amount: \$14,752.00

Matter: Dellis' Bar & Grill

Attorney's Fees

7/3/2019	Confer w/ HBH and SEK re. case status.	J.L.	.10	\$21.50
7/3/2019	Confer with associate attorneys re status of matter.	H.B.H.	.10	\$40.00
7/17/2019	Prepare civil cover sheet and summons.	J.L.	.20	\$43.00
7/17/2019	Tele conf with E. Betz re status of matter; review complaint with client. Review and revise complaint; confer with assoc atty re summons/civil cover sheet. Open case via ECF.	H.B.H.	1.40	\$560.00
7/18/2019	Review case management order and issued summons.	J.L.	.10	\$21.50
8/1/2019	Draft/file consent to magistrate judge	S.K.	.40	\$82.00
8/2/2019	Draft/file updated consent to magistrate	S.K.	.40	\$82.00
8/5/2019	Review paperless order.	J.L.	.10	\$21.50
8/22/2019	Review email from HBH to Pl. Betz re. case status update.	J.L.	.10	\$21.50
8/22/2019	Draft comm to client re status update.	H.B.H.	.20	\$80.00
8/22/2019	Review comm from process server re status of service.	H.B.H.	.10	\$40.00
8/29/2019	Comm with associate attys re filing proof of service.	H.B.H.	.10	\$40.00
8/30/2019	File Return of Summons Executed (Spanellis)	S.K.	.10	\$20.50
8/30/2019	File Return of Summons Executed (Crows Nest)	S.K.	.10	\$20.50
9/5/2019	Phone confer w/ opposing counsel re. service date and potential extension to Answer.	J.L.	.10	\$21.50
9/10/2019	Review Answer from Defendant.	S.K.	.20	\$41.00
9/10/2019	Review Answer.	J.L.	.10	\$21.50
9/11/2019	Review Answer to Complaint.	S.K.	.10	\$20.50
9/16/2019	Review order assigning case to Magistrate Judge.	J.L.	.10	\$21.50
9/18/2019	Review Defendants' motion for RPDs.	J.L.	.10	\$21.50

9/18/2019	Review disclosure of corporate interest.	J.L.	.10	\$21.50
9/19/2019	Review scheduling order from Court.	J.L.	.10	\$21.50
9/19/2019	Review scheduling order and calendar important dates.	S.K.	.30	\$61.50
9/19/2019	Briefly review Scheduling Order and multiple filings by Court.; confer with Assoc Atty SK re same.	H.B.H.	.10	\$40.00
9/20/2019	Phone call w/ Pl. Betz re. status of case.	J.L.	.20	\$43.00
9/25/2019	Review pleadings file, complaint and answer, draft interrogatories.	J.L.	3.70	\$795.50
9/26/2019	Review pleadings file, complaint and answers, draft requests for production of documents.	J.L.	3.70	\$795.50
9/27/2019	Revise and edit interrogatories.	J.L.	.30	\$64.50
9/27/2019	Review edit Interrogatories to Crows Nest.	S.K.	.30	\$61.50
9/27/2019	Review/Edit RPDs to Crows Nest.	S.K.	.30	\$61.50
9/27/2019	Draft requests for production of documents (1.6); edit and revise requests for production of documents (0.7).	J.L.	2.30	\$494.50
10/1/2019	Review Defs consent to magistrate judge.	J.L.	.10	\$21.50
10/1/2019	Review Consent to proceed before Magistrate.	S.K.	.10	\$20.50
10/1/2019	Review paperless order re: consent to magistrate	S.K.	.10	\$20.50
10/1/2019	Review Order re consent to Magistrate Judge assignment.	H.B.H.	.10	\$40.00
10/3/2019	Conf. call w/ Court and counsel re: scheduling.	S.K.	.20	\$41.00
10/3/2019	Review order referring case to Magistrate Judge Gesner.	S.K.	.10	\$20.50
10/3/2019	Tele conf with Court and opposing counsel re scheduling. (.1 hrs).	H.B.H.	.10	\$40.00
10/3/2019	Review Order referring case to Judge Gesner re settlement.	H.B.H.	.10	\$40.00
10/10/2019	Review order scheduling mediation, calendar all required deadlines.	J.L.	.20	\$43.00
10/10/2019	Review Order re Settlement Conference.	H.B.H.	.10	\$40.00
10/10/2019	Review order sched. sett. conf.	S.K.	.10	\$20.50
10/14/2019	Review and revise Interrogatories and RPDs to Crows Nest. Draft Interrogs to individual Defendant. Draft Request for Admissions. Review and revise, transmit to opposing counsel.	H.B.H.	1.80	\$720.00
10/16/2019	Briefly review written discovery served on E. Betz.	H.B.H.	.20	\$80.00
10/16/2019	Review and respond to comm from opposing counsel re amended answer.	H.B.H.	.20	\$80.00
10/23/2019	Review QC Notice re: Mot. for Disclosure.	S.K.	.10	\$20.50
10/23/2019	Review Deficiency Notice - Local Rule 103.3 disclosure.	S.K.	.10	\$20.50
10/25/2019	Review Local Rule 103.3 Disclosure Statement.	S.K.	.10	\$20.50
11/7/2019	Review Defs answers to RFAs.	J.L.	.10	\$21.50
11/7/2019	Review order granting mot. for leave to amend answer.	S.K.	.10	\$20.50
11/7/2019	Review requests for admission	S.K.	.30	\$61.50
11/7/2019	Review Def's response to Request for Admissions. Draft comm to co-counsel re same.	H.B.H.	.30	\$120.00
11/15/2019	Review interrogs and RPDs from def.	S.K.	.60	\$123.00

11/18/2019	Tele conf with D. Preller re status of matter and discovery status. (.2 hrs). Draft consent Motion re Extension of Time. (.8 hrs).	H.B.H.	1.00	\$400.00
11/19/2019	Review consent motion to extend scheduling order.	J.L.	.10	\$21.50
11/20/2019	Phone call w/ Pl. Betz re. status of case.	J.L.	.10	\$21.50
11/20/2019	Review scheduling order and calendar new days.	S.K.	.30	\$61.50
12/2/2019	Draft email to Preller re: production of documents.	S.K.	.10	\$20.50
12/2/2019	Confer with S. Kraff re wage/hour records and discovery. Review comm from S. Kraff to opposing counsel re production of docs.	H.B.H.	.10	\$40.00
12/5/2019	Draft comm to D. Preller re missing wage records.	H.B.H.	.10	\$40.00
12/6/2019	Tele conf with D. Preller re status of matter.	H.B.H.	.10	\$40.00
12/9/2019	Direction Conf. w/ HBH and SEK re: need to contact Preller re documents.	J.L.	.10	\$21.50
12/9/2019	Review email between SEK and opposing counsel re. production of documents.	J.L.	.10	\$21.50
12/9/2019	Direction Conf. w/ HBH and JSL re: need to contact Preller re documents.	S.K.	.10	\$20.50
12/9/2019	Draft email to Preller re: need for documents.	S.K.	.10	\$20.50
12/11/2019	Review email from HBH to opposing counsel re. non-production of documents.	J.L.	.10	\$21.50
12/17/2019	Review documents produced by Defendants.	S.K.	.90	\$184.50
12/20/2019	Review wage and hour records.	J.L.	.20	\$43.00
12/20/2019	Review email from SEK to Pl. Betz re. review of wage and hour documents.	J.L.	.10	\$21.50
12/20/2019	Call w/ Betz re: wage and hour docs	S.K.	.30	\$61.50
12/20/2019	Call w/ Expert Kimel re: expert report.	S.K.	.10	\$20.50
12/20/2019	Strategy Conf. w/ HBH and JSL re: current needs of case and expert report	S.K.	.10	\$20.50
12/20/2019	Strategy Conf. w/ HBH and SEK re: current needs of case and expert report.	J.L.	.10	\$21.50
12/20/2019	Draft email to Betz re: case update and document production.	S.K.	.20	\$41.00
12/20/2019	Direction conf with associates re expert report and calcs.	H.B.H.	.10	\$40.00
12/20/2019	Review produced docs for damage calculations and determine needs for expert witness.	S.K.	.70	\$143.50
12/23/2019	Review email from opposing counsel re. discovery in word format.	J.L.	.10	\$21.50
12/23/2019	Review email from Preller re: discovery.	S.K.	.10	\$20.50
12/23/2019	Review additional documents provided by Betz.	S.K.	.30	\$61.50
12/27/2019	Review email from Preller re: discovery.	S.K.	.10	\$20.50
12/30/2019	Compile and send documents/data to expert Kimel for expert report.	S.K.	.40	\$82.00
1/2/2020	Call w/ Plaintiff Betz re: hours of work for damage calculations.	S.K.	.40	\$82.00
1/2/2020	Draft email to Betz re: scheduling call.	S.K.	.10	\$20.50
1/2/2020	Call w/ Expert Witness re: damage calculations and pay documents.	S.K.	.30	\$61.50
1/2/2020	Compile and forward recollection data to expert witness.	S.K.	.30	\$61.50

1/3/2020	Review email from Expert witness re: clarifying data + draft response.	S.K.	.20	\$41.00
1/3/2020	Review preliminary draft of expert report from Kimel and contact expert re: changes needed to be made.	S.K.	.70	\$143.50
1/6/2020	Review expert report.	J.L.	.70	\$150.50
1/6/2020	Email opposing counsel Rule 26(a)(2) expert report and designation.	J.L.	.10	\$21.50
1/6/2020	3 calls with expert Kimel re: edits to expert report.	S.K.	.50	\$102.50
1/6/2020	Review/edit expert report.	S.K.	.70	\$143.50
1/6/2020	Finalize and send out expert report and expert designation.	S.K.	.90	\$184.50
1/8/2020	Review scheduling order + update calendar.	S.K.	.40	\$82.00
1/13/2020	Review and revise mediation letter to Judge Gesner. Confer with S. Kraff re same.	H.B.H.	.60	\$240.00
1/13/2020	Draft letter to Judge Gesner re: mediation statement.	S.K.	3.30	\$676.50
1/13/2020	Finalize mediation statement and exhibits to send to Judge Gesner.	S.K.	.70	\$143.50
1/13/2020	Strategy Conf. w/ HBH re: mediation statement.	S.K.	.30	\$61.50
1/15/2020	Review email from Betz re: mediation.	S.K.	.10	\$20.50
1/17/2020	Phone confer w/ HBH and opposing counsel re: potential settlement and upcoming mediation.	J.L.	.20	\$43.00
1/17/2020	Review email from HBH to Pl. Betz re. settlement offer.	J.L.	.10	\$21.50
1/17/2020	Draft lodestar statement.	J.L.	.20	\$43.00
1/17/2020	Tele conf with D. Preller (w/ J. Liew) re settlement discussions. Review file materials.	H.B.H.	.20	\$80.00
1/17/2020	Draft comm to client re status of matter and settlement.	H.B.H.	.20	\$80.00
1/21/2020	Review email from HBH to opposing counsel re. settlement offer.	J.L.	.10	\$21.50
1/21/2020	Review email from HBH to Betz re: settlement offer.	S.K.	.10	\$20.50
1/21/2020	Review email from HBH to Preller re: settlement offer.	S.K.	.10	\$20.50
1/22/2020	Comm with client re status of matter.	H.B.H.	.10	\$40.00
1/22/2020	Tele conf with Donna in Judge Gesner's Chambers re status of negotiations; forward comm re same.	H.B.H.	.10	\$40.00
1/24/2020	Draft comm to opposing counsel re status of matter.	H.B.H.	.10	\$40.00
1/28/2020	Travel to and from Baltimore; attend mediation before Judge B. Gesner.	H.B.H.	5.50	\$2,200.00
1/28/2020	Draft comm to TJM re preparation of settlement agreement and Joint Motion.	H.B.H.	.20	\$80.00
1/28/2020	Attend Settlement Conf. (3.5) + travel to/from conf. (2.0)	S.K.	5.50	\$1,127.50
1/29/2020	Draft Settlement agreement, Motion to Approve, and Proposed Order, review and revise same	T.J.M.	1.60	\$240.00
1/29/2020	Review HBH revisions to Motion for Approval and Settlement Agreement	T.J.M.	.30	\$45.00
1/29/2020	Review draft Settlement Agreement and Motion to Approve.	S.K.	.20	\$41.00

1/29/2020	Review email from Betz re: W2	S.K.	.10	\$20.50
SUBTOTAL:			52.20	\$13,332.00

Costs

7/17/2019	Filing Fee	\$400.00
9/5/2019	Service of Process	\$65.00
1/6/2020	Expert Witness Fee	\$955.00
SUBTOTAL:		\$1,420.00

Matter Ledgers

SUBTOTAL:

Trust Account

2/11/2020	Previous Balance	\$0.00
Available in Trust:		\$0.00

TOTAL \$14,752.00
PREVIOUS BALANCE DUE \$0.00

CURRENT BALANCE DUE AND OWING \$14,752.00